REMARKS

The claimed invention is directed to mobility management in a wireless communication network. The network comprises a packet control function (PCF), a plurality of access network controllers (ANC) that connect an access terminal (AT) to the PCF, and a session controller (SC). The SC stores session information used by the ANCs to connect the ATs to the PCF. Thus, the SC provides AT mobility management at the subnet granularity by handling mobility management tasks typically handled by PCFs in conventional networks. The claimed arrangement eliminates the need to involve the PCF in the handoff of dormant ATs between ANCs within the same subnet, and allows a single subnet to span multiple ANCs.

One of the functions performed by the session controller is redirecting service requests received by a first access network controller from a packet control function to a second access network controller. This function is recited in each of the independent claims. The redirection function is present in the claimed invention because the PCF and SC are different logical entities; however, those skilled in the art will appreciate that the PCF and SC could still be co-located in a single network node.

The Examiner rejected claim 1 as being obvious over Lim in view of Einola. Claim 1 recites, "a session controller ... to redirect service requests received by a first access network controller from a packet control function to a second access network controller." The references do not teach or suggest, alone or in combination, a logically separate session controller for redirecting service requests as claimed.

The Examiner admits that Lim, which discloses a system and method of controlling a packet data service in a mobile communications network, fails to teach or suggest a session controller that redirects service requests received by a first access network controller from a packet control function to a second access network controller. However, the Examiner attempts to remedy this deficiency with Einola. Einola discloses a method of performing relocation (i.e.,

handoff) procedures for mobile user equipment (UE) as it moves between radio network controllers (RNCs) and serving nodes. *Einola*, p. 1, ¶[0001]. Particularly, UEs may be handed off from a first RNC of a first node to a second RNC of a second node. If the first and second serving nodes are different, and if there is a change in the Radio Resource Connection (RRC) state, Einola teaches switching control of the communications to the second serving node. Otherwise, Einola retains control of the communications at the first serving node. *Einola*, p. 3, ¶¶[0031-0032]; Figure 3.

The Examiner equates the relocation procedures of Einola to the service requests of claim 1. However, the two are not the same. A "service request" as understood by those skilled in the art, and as claimed, is a request to set up a service (e.g., an A9 setup A8 message). *E.g., Spec.*, p. 8, ¶[0025]. A "relocation procedure," in contrast, is when a UE switches between nodes. In the context of Einola, it is a location-based switch between RNCs/serving nodes that occurs *after* a service session is already in progress. The Einola relocation procedure is not a service request, and further, has nothing to do with service requests. No one skilled in the art would equate a relocation procedure to the claimed service request.

Not only do the references fail to teach or suggest a session controller that redirects service requests, but they also fail to teach or suggest that the session controller redirects the service requests from a first ANC to a PCF, and then to a second ANC.

Lim teaches a Location Management Function (LMF) that that is co-located with a Mobile Switching Center (MSC) or PCF. However, because the LMF is implemented in the PCF, it does not perform all of the functions of the claimed session controller. In particular, the LMF does not perform the function of redirecting service requests received by a first ANC from the PCF to a second ANC. This is because the LMF is integrated into the function of the PCF. Moreover, Einola sends relocation requests (i.e., *not* service requests) between service nodes. Thus, Einola fails to remedy Lim.

In sum, Lim does not teach or suggest the claimed session controller because Lim fails to teach or suggest a session controller that redirects service requests received by a first ANC from a PCF to a second ANC. Einola also fails to teach or suggest this element. Because both references alone fail to teach or suggest this element of claim 1, any alleged combination (even if one were possible) would necessarily fail to teach or suggest this element of claim 1. Therefore, the references fail to teach or suggest claim 1, and the §103 rejection of claim 1 and its dependent claims must be withdrawn.

The Examiner also rejected claims 25, 41, and 60 as being obvious over Lim in view of Einola. However, these claims include language similar to that of claim 1. As such, neither Lim nor Einola teaches or suggests, alone or in combination, any of claims 25, 41, 60, or any of their respective dependent claims. Therefore, the §103 rejection of these claims must also be withdrawn.

In light of the foregoing remarks, all claims are patentably non-obvious over the cited references. Accordingly, Applicant respectfully requests allowance of all pending claims.

Respectfully submitted,

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Dated: September 27, 2007

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